

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: EHSAN ULLAH KHAN, aka Ehsan Khan, aka Ehsan U. Khan, and MISBAH EHSAN KHAN, aka Misbah Khan, aka Misbah E. Khan, Debtors	: : : : :	Chapter: 13 Case No.: 19-10715-elf
WESTLAKE FINANCIAL SERVICES, Movant,	: :	
v.	:	Motion for Relief from Stay
EHSAN ULLAH KHAN, MISBAH EHSAN KHAN and SCOTT F. WATERMAN, TRUSTEE, Respondents,	: : :	

**ANSWER TO MOTION OF
WESTLAKE FINANCIAL SERVICES FOR RELIEF FROM STAY**

AND NOW COMES Debtor(s) **EHSAN ULLAH KHAN** and **MISBAH EHSAN KHAN**, by and through their attorneys, FISHER CHRISTMAN, and in Answer to the Motion of **WESTLAKE FINANCIAL SERVICES** for Relief from Stay aver:

1. Denied. Debtors lack sufficient information and belief as to Admit or Deny the exact address of Movant and such is therefore Denied.
- 2-5. Admitted.
6. Admitted for purposes of this Motion only, as Debtors are not aware of the full V.I.N.
7. Denied. Upon information and belief, Movant has failed to credit Debtors with multiple postpetition payments and the balance due is far less. Debtor is researching the status of payments tendered to Movant to if all payments were negotiated by Movant.
8. Denied. See response to paragraph 7, above.
9. Admitted.
10. Admitted for purposes of this Motion only.
11. Admitted.

12. Admitted. However, it is Denied that Movant has any cause for relief, as Debtor has made postpetition payments and has a large amount of equity in the vehicle.

13. Denied. The vehicle's day of rapidly depreciating are long past.

14. Denied. Denied. Debtors lack sufficient information and belief as to Movant's attorneys' fees, and such is therefore Denied. Debtors also Deny that attorneys' fees were reasonably incurred, based on postpetition payments and Debtors' large amount of equity in the vehicle

WHEREFORE, Debtor(s) **EHSAN ULLAH KHAN** and **MISBAH EHSAN KHAN** respectfully pray(s) this Honorable Court for an Order than the Motion of **WESTLAKE FINANCIAL SERVICES** for Relief from Stay be Denied, and for such other and further relief as the Honorable Court deems just and appropriate.

FISHER CHRISTMAN

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